

10th May 2016



Planning Policy Team
Adur and Worthing Councils
Town Hall
Chapel Road
Worthing
BN11 1BR

Andrew Watson
E: AJWatson@Savills.com
DL: 01798 345995
F: 01798 345998

Exchange House
Petworth
GU28 0BF

www.savills.com

Dear Sirs

Re: Representation on the Adur and Worthing Local Plan

Introduction

Brighton & Hove City Council (hereafter referred to as the "BHCC") would like to thank Adur and Worthing Councils (AWC) for the opportunity to comment on their Submission Local Plan (hereafter referred to as the "Plan"). As the strategic planning document that will shape the future of the area, it is an important document that needs to create the right balance of social, economic and environmental objectives. The role it will play in future planning decisions will be critical, and it is important that the Plan successfully achieves this balance through its policies.

About the BHCC Downland Estate

At 10,500 acres, BHCC's Downland Estate comprises a substantial rural landholding falling under a single public ownership. Through ownership of the Downland Estate, BHCC - in addition to considering the Estate as part of their overall property investment portfolio - are also presented with the opportunity to deliver on conservation and social wellbeing related issues. This is encapsulated within the Council's City Downland Estate Policy (CDEP). The policy brings together the Property and Design team with the Council's City Parks and Sustainability Teams and seeks to incorporate social and environmental considerations not only into day-to-day management decision making, but also by identifying opportunities for the considerable environmental and social gains that can be realised through land ownership.

The CDEP has evolved out of the Downland Initiative and aims to:

'Sustain natural resources provided by the Council's Downland Estate by working in partnership with relevant stakeholders and potential beneficiaries and pursuing an economically sustainable approach for the Council and its tenant farmers.'

It examines the feasibility of securing sustainable management of the Downland Estate and is aligned with the Biosphere Reserve objectives. The Policy also incorporates the main Corporate Plan 2015-2019 objectives:

- 1) To tackle inequality and work to create a fairer city;
- 2) To create a more sustainable city;
- 3) To engage more individuals and groups across the city.

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The policy is implemented by working in partnership with Council departments, the SDNPA, tenant farmers and other stakeholders. The receipts from development opportunities form part of BHCC's Central Investment Fund. They are used to finance capital projects and new development, which provide substantial benefits for the local community.

Background to previous SHLAA submission

In 2014, BHCC submitted the Mill Hill site (Ref: ADC/126/13) for consideration as part of the Strategic Housing Land Availability Assessment (SHLAA) process. AWC subsequently assessed the site, through the 2015 SHLAA, and made the following comments:

<p>ADC/126/13 Land at Mill Hill Shoreham</p>	<p>This site, that was not previously considered as part of the 2009 and 2012 SHLAA review, is rejected from the scope of this study because it is not considered that there is a reasonable prospect that housing will be delivered on the site as the site (owned by Brighton & Hove City Council) is not currently available.</p>
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The original assessment queries whether the site is available for development, which I have addressed below. Through subsequent discussions with AWC a number of further questions were raised in relation to transport and landscape/visual impact. These are also addressed through this representation.

Description of Site

The site is located close to the town centre of Shoreham; to the north of The Street and to the west of Mill Hill. It is currently used as grazing land for horses and includes a number of stable buildings and other structures related to the sites equine use. Access is provided at the south-west corner of the site at the intersection of The Street and Mill Hill. Vegetation is limited to the perimeter of the site.

Topographically, the site slopes from north to south from approximately 15m AOD in the south-west corner to approximately 45m AOD in the north-east corner. Residential development is located to the south and east of the site. The northern and western parts of the site abut an area of woodland. Further to the north the site is the A27 (Shoreham Bypass). The National Park is located beyond the A27. However, it is severed from the site by virtue of the substantial road infrastructure. A public Right of Way runs around the north and west of the site.

Policy Context

The site is currently allocated in the Plan as being within the 'Countryside' (policy 13 – Adur's Countryside and Coast); and a 'Local Green Gap' (policy 14). These policies seeks to constrain development outside of the built up area boundary unless a number of specified criteria are met. This site is also partly-located within an area covered by a Site of Nature Conservation Importance (policy 32) designation.

Consultations on the Submission Local Plan

This section sets out BHCC's response to the SHLAA assessment and other subsequent points raised.

Tests of Soundness

Paragraph 182 of the National Planning Practice Guidance (NPPG) explains that plans should be:

- *Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;*
- *Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;*

- *Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and*
- *Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.*

The Plan forms a strong basis for facilitating sustainable development in the district. However, it is not currently sound for two main reasons:

- a) It has not been positively prepared because it is not based on a strategy that would meet objectively assessed development requirements; and
- b) It is also not consistent with national policy, particularly paragraph 47 of the National Planning Policy Framework, which urges local authorities to *'boost significantly the supply of housing...'* and *'meet their full objectively assessed need for market and affordable housing.'*

Housing Need

The AWC Objectively Assessed Needs (OAN) for Housing (2015) was recently updated and identifies a shortfall of 2,211 dwellings over the plan period. This was confirmed by the 8th March 2016 officer report to AWC planning committee, which explains that:

'...the amount of residential development that can be delivered (3,609 dwellings over the plan period - an annual delivery target of 180) when measured against Adur's Objectively Assessed Needs still results in a shortfall; this shortfall figure has been updated to 2,211 dwellings.' (page 4, para 3.8)

AWC will be aware that a number of local authorities, including BHCC, have had to review their housing sites through the Local Plan Examination Process to ensure that no stone is left unturned in their attempts to meet housing need. The Mill Hill site provides an important opportunity to fulfil some of this remaining housing need, including contributing to affordable housing provision. This would help to make sure that the Plan complies with the NPPF and is therefore sound.

Sustainable Location

The site is located in a highly sustainable location close to Shoreham town centre where there is a mainline train station, comprehensive bus service, shops and other services. These services can be walked to in approximately 15 minutes, or cycled to in 4 minutes, which will substantially reduce the need to travel by car.

Landscape and Visual Considerations

The latest landscape assessment by Sheilsfynn (2016) identifies the site as an important landscape area. This is set out on page 34 of the report where it states that:

'...any reduction in the size and openness of the field risks resulting in a change in character, as the field could potentially be perceived as a small urban paddock rather than a component of the sweeping Downs landscape.'

And that:

'If the urban areas were to extend across the Mill Hill Slopes, the A27 would mark the interface between urban development and countryside in longer views from the Downs. In such circumstances, the A27 would be perceived as a poor quality, abrupt visual boundary to the SDNP'

This part of the Sheilsfynn assessment is not agreed with because the landscape character of the site has already been largely compromised by the presence of the A27 which acts as a major physical barrier,



separating the site from the National Park and preventing it from being viewed as part of the 'sweeping downs landscape.'

With regards to visual sensitivity, it is agreed that the northerly and western parts of the site are sensitive. This is because they are more apparent in views of the site and are located closer to the Site of Nature Conservation Importance. However, the southern and eastern parts of the site, which are less visible and closer to the existing residential development, are less sensitive. In 2014, BHCC instructed Farbrik landscape architects to prepare landscape advice on the site, which reinforces this view.

A sensitive development at Mill Hill could provide an opportunity to protect the northern part of the site through the provision of publicly accessible open space to serve the needs of the local area and maintain the landscape character. This would provide opportunities to contribute to the green linkages provided by Mill Hill Local Nature Reserve and onwards to the South Downs National Park. The provision of new landscaped areas provides a related opportunity for biodiversity and ecology enhancements, which could potentially be linked to the River Adur to reinforce existing biodiversity areas.

Vehicular Access

During the SHLAA assessment process, questions were raised over whether suitable access could be achieved. BHCC has subsequently instructed a highways engineer (Bellamy Roberts) to visit the site and determine whether access could satisfactorily be achieved.

The work undertaken by Bellamy Roberts has determined that vehicular access can be achieved to a level that is an improvement on the existing situation. This includes the opportunity for safer and more legible access on to the site, suitable for a modest level of development. The results of this technical study are enclosed within this response.

Site Availability

During AWC's assessment of the site there was some uncertainty as to whether the site is available. On 22nd February 2016 I wrote to the planning policy department to clarify that the site is available and ready for development. A copy of the correspondence is enclosed with this representation.

Conclusion

BHCC would like to thank AWC for the opportunity to comment on and influence this important emerging planning policy. Finally, should officers want to meet with BHCC and its representatives to discuss this letter, we would be more than happy to do so.

Yours Sincerely

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Andrew Watson • MRTPI
Associate Planner
e AJWatson@savills.com • t 01798 345995

CC

- Jessica Hamilton, Brighton and Hove City Council
- Guy Streeter, Savills

Enclosures

- Bellamy Roberts transport study; copy of correspondence with AWC